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*\*Pro Hac Vice*

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**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

**RACHAEL NAVARRO**, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

**JUSTFAB, LLC d/b/a JUSTFAB**, a  
Delaware limited liability company,

Defendant.

Case No. 2:21-cv-01002-JAM-DMC

**SECOND UNOPPOSED  
MOTION FOR EXTENSION OF  
TIME FOR DEFENDANT  
JUSTFAB, LLC TO RESPOND  
TO PLAINTIFF'S COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiff Rachael Navarro ("Navarro" or "Plaintiff"), by and through her counsel, hereby files this Second Unopposed Motion for Extension of Time for Defendant JustFab, LLC to Respond to Plaintiff's Complaint. Plaintiff respectfully moves the Court for a thirty (30) day extension to **September 29, 2021** for Defendant JustFab, LLC d/b/a JustFab ("JustFab" or

1 “Plaintiff”) to respond to the Complaint. In support of the motion, Plaintiff states as  
2 follows:

3 1. On June 4, 2021, Plaintiff filed a putative class action complaint  
4 (“Complaint”) against Defendant. (Dkt. 1.)

5 2. On June 9, 2021, JustFab was served with the Complaint and  
6 Summons (dkt. 7), placing its deadline to respond on or before June 30, 2021.

7 3. Counsel for JustFab reached out to Plaintiffs’ counsel, and on June 30,  
8 2021, Plaintiff filed an unopposed motion for extension of time, requesting sixty  
9 (60) days for the parties to confer and evaluate the allegations in the Complaint. The  
10 Court granted the motion and set Defendant’s deadline to respond for August 30,  
11 2021. (Dkt. 9, 10.)

12 4. Plaintiff hereby requests an additional thirty (30) days for the parties to  
13 confer and evaluate the allegations in the Complaint. Defendant has provided  
14 records to controvert Plaintiff’s claims, and the additional time will permit counsel  
15 for Plaintiff to assess such records and procure confirmatory records of her own,  
16 and it will further permit JustFab sufficient time to review the allegations contained  
17 within the Complaint and respond as necessary.

18 5. Good cause exists for this request, and the extension of time requested  
19 will not cause prejudice to either Party or the Court. Further, this extension is not  
20 sought for dilatory reasons or any other improper purpose. Plaintiff has previously  
21 moved for an extension of sixty days to the same effect.

22 6. Plaintiff’s counsel has conferred with counsel for Defendant who have  
23 consented to the requested thirty (30) day extension.

24 WHEREFORE, Plaintiff Rachael Navarro respectfully requests that the  
25 Court enter an order granting the requested extension of time for Defendant to  
26

1 respond to Plaintiff's Complaint up to and including September 29, 2021, and for  
2 any other relief the Court deems necessary and just.

3 Respectfully submitted,

4  
5 Dated: August 27, 2021

**RACHAEL NAVARRO**, individually and  
on behalf of all others similarly situated,

6  
7 By: /s/ Stephen A. Klein  
One of Plaintiff's Attorneys

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17 *Counsel for Plaintiff and the Putative Class*  
18 \*Admitted *pro hac vice*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 27, 2021, a true and correct copy of the above papers was served upon counsel of record by filing such papers via the Court's CM/ECF system.

/s/ Stephen A. Klein